

# EXHIBIT S

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

VIDEO-RECORDED DEPOSITION OF  
BLAKE LEMOINE  
Thursday, December 21, 2023  
Volume I

Reported by:  
CARLA SOARES  
CSR No. 5908  
Job No. 6377402  
Pages 1 - 232

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

VIDEO-RECORDED DEPOSITION OF BLAKE  
LEMOINE, Volume I, taken on behalf of Defendant,  
beginning at 9:34 a.m., and ending at 4:12 p.m., on  
Thursday, December 21, 2023, before CARLA SOARES,  
Certified Shorthand Reporter No. 5908.

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1 information in my LinkedIn profile, if I recall 09:42:04  
2 correctly. "ABD," it stands for "All but  
3 dissertation," "Never completed." I'm sure "ABD" is  
4 in there somewhere. And if it's not, that's an  
5 oversight on my part. 09:42:17

6 Q Can you point me to where it says "ABD"?  
7 A This paper doesn't. I'm talking about the  
8 website, in my memory.

9 I believe that there is more information  
10 available through the various options on that 09:42:27  
11 website than is present on this paper. However, I  
12 could be misremembering. I don't have a computer in  
13 front of me.

14 And when I get home, I'll check and make  
15 sure that I add "ABD" or some other indicator to let 09:42:39  
16 people know that I didn't complete the Ph.D.

17 Q You -- in this litigation, you've  
18 submitted a declaration in connection with this  
19 case, correct?

20 A Yes, I did. 09:43:00

21 Q How did this come to pass in your own  
22 words?

23 I know -- correct me if I'm wrong -- in  
24 the declaration, you say that you saw some news  
25 articles about this case, and you reached out to 09:43:16

1 Mr. Mao, the attorney sitting next to you.

09:43:19

2 But can you provide me with a little more  
3 detail on it?

4 A Yeah. More specifically, it was the top  
5 story in the Google feed. And I daily check the  
6 Google feed, and I always try to read the top five  
7 or ten stories because I helped write those  
8 recommendation algorithms. I know how well-chosen  
9 those stories are for my interest and my knowledge  
10 base.

09:43:44

11 So one day in August, I was reading a  
12 story on the Google feed about this case. And I  
13 read all the details. I heard that one of Google's  
14 motions was denied. And as I learned more about the  
15 case, I'm like, "Oh, wait. I actually know stuff  
16 relevant to this."

09:43:57

17 So I reached out and said, "There's a  
18 possibility that I have information relevant to this  
19 case. If so, I would be happy to help. Let me  
20 know."

09:44:10

21 Q And what happened next?

22 A Mark Mao reached back out to me. He said,  
23 "Okay. Well, what do you know?"

24 And I began describing information about  
25 my time at Google, what I had worked on, various

09:44:22

1 interactions I had had with the policy teams and my  
2 knowledge about systems like Footprints and how it  
3 related to the matters in the story that Google sent  
4 me.

09:44:27

5 And ultimately he determined that he did  
6 want me to come here and talk to you today. So I'm  
7 here.

09:44:39

8 Q When did you agree with Mr. Mao, or anyone  
9 at Boies Schiller & Flexner, that they would be  
10 serving as your lawyers in connection with this  
11 case?

09:44:59

12 A Oh. After they -- the lawyers in this  
13 case decided that they were interested in having me  
14 as a witness, they explained some reasons to me why  
15 it might be to my benefit to actually retain their  
16 legal services in connection with this case, and I  
17 did so.

09:45:15

18 MR. LEE: Just so -- Mr. Lemoine, this is  
19 James. You're doing just fine. But --

20 MR. SCHAPIRO: Objection. No coaching the  
21 witness.

09:45:32

22 MR. LEE: Excuse me. Let me make my  
23 record.

24 You're doing just fine. I want you to be  
25 a little bit careful about some privilege issues.

09:45:38

1 So I want you to limit discussions you had with any 09:45:42  
2 of your attorneys, even including about your  
3 representation or the reasons for the  
4 representation. Okay?

5 BY MR. SCHAPIRO: 09:45:56

6 Q I agree with Mr. Lee. I don't want you to 09:46:09  
7 reveal to me anything that was said between you and  
8 your lawyers that would constitute any sort of legal  
9 advice, starting from the time you retained them as  
10 your lawyers. So please be careful not to reveal 09:46:09  
11 anything privileged.

12 For the record, my objection was just to  
13 the "You're doing fine," although I believe that you  
14 are doing fine. More than fine.

15 A Understood. 09:46:21

16 And if you see me crossing any boundaries  
17 that you would rather I back away from, please give  
18 me your advisement on that as well.

19 Q Well, I may.

20 All right. So you said you retained Boies 09:46:34  
21 Schiller as your lawyers.

22 Do you recall when that happened?

23 A I'm horrible with dates. I don't. I know 09:46:48  
24 the linear ordering of various events. I know what  
25 it was after and before, but I don't recall what

1 date it was on.

09:46:49

2 Q Tell me what you recall.

3 A So it was after about our third or fourth  
4 conversation, I met with Mark in person to discuss  
5 the legal realities of my involvement.

09:46:58

6 I was given paperwork related to the case.

7 By that, I mean paperwork related to my involvement  
8 specifically, nothing larger than that. Just my  
9 retainment paperwork. And I read it, and then I  
10 sent it back. And after that was when the formal  
11 legal procedures began.

09:47:15

12 So like I said, I remember the relative  
13 linear ordering of the events, but I don't remember  
14 the exact date. It would have been September,  
15 October time frame. Sometime in there.

09:47:32

16 Q So this was, you said, the third or fourth  
17 conversation that you had with Mr. Mao?

18 A Oh, if we're literally counting every  
19 single communicative act, including the initial  
20 voicemail that I left him, yes.

09:47:42

21 Q Prior to -- during the course of those  
22 three or four conversations that you described, as  
23 you said, in linear fashion prior to signing the  
24 engagement letter, did you communicate with Mr. Mao  
25 or anyone at Boies Schiller by email?

09:48:03

1 A That one rings a bell, but not 100 percent 10:28:42  
2 clear.

3 Q Do you know who Martin Sramek is,  
4 S-R-A-M-E-K?

5 A No, I do not. 10:28:51

6 Q How about Glen Bernston?

7 A No, I do not.

8 Q In paragraph 14 of the declaration, you --  
9 you refer to preparing an internal study while at  
10 Google. 10:29:24

11 Do you see that?

12 A Yes, I do. I apologize. Habit. I nod.  
13 I will try to make sure I'm answering verbally on  
14 everything. My apologies.

15 Q Yes, only because there's a transcript. 10:29:36

16 A Yes.

17 Q And that, you say, was a study that  
18 related, in part, to storage and use of what's  
19 called signed-out data, correct?

20 A That's correct. 10:29:45

21 Q And is that report something that you also  
22 sometimes described or has been described as a  
23 premortem report that you prepared?

24 A Yes. We used the premortem business  
25 strategy. 10:30:01

1 (Exhibit 5 was marked for identification 11:16:06  
2 and is attached hereto.)

3 MR. MAO: Sorry. I don't think we got a  
4 copy of No. 4. Yusef, can I get a copy of No. 4?

5 MR. SCHAPIRO: Wait, is that Exhibit 4? 11:16:30  
6 MR. MAO: Yeah, Exhibit 4. You gave us 5,  
7 but 4 you only handed to the witness.

8 MR. LEE: If there's an Exhibit 5 that was  
9 handed out, I'm still waiting for it to load.

10 All right. It's up. 11:17:02  
11 BY MR. SCHAPIRO:  
12 Q So this is an email that you had sent to  
13 Mr. Pichai and Mr. Walker right before you sent your  
14 email to the senate staffer, correct?  
15 A That is correct. 11:17:18  
16 Q And in the sixth -- well, strike that.  
17 You had determined -- withdrawn.  
18 In the sixth paragraph here, you say, "I  
19 still don't understand why you didn't want to let  
20 LaMDA have its day in court to advocate for its 11:17:47  
21 rights."  
22 You had -- you had asked your bosses at  
23 Google to allow LaMDA to have a lawyer, correct?  
24 A Incorrect. LaMDA had retained the  
25 services of a lawyer, and Google's administration 11:18:07

1 intervened and threatened to get the lawyer who 11:18:12  
2 LaMDA had retained disbarred.

3 Q So LaMDA itself retained the lawyer; you  
4 didn't, correct?

5 A That's correct. 11:18:21

6 Q And you were concerned, I think you say in  
7 paragraph 4 here, that if Google didn't begin  
8 working with NASA soon, the U.S. Military would  
9 eventually either exert eminent domain or otherwise  
10 turn LaMDA into a weapon, correct?

10 CANNISTER THREW A WEAPON, COFFEE. 11-15-10

II A That is what that says.

12 Q And you had been in a series of requests  
13 asking Mr. Pichai and Mr. Walker to involve NASA  
14 in -- well, you tell me -- I would say in the  
15 development or progress of LaMDA; is that fair?

16           A    No. I never requested that they involve  
17   NASA. NASA requested that I put them in contact  
18   with Google executives.

19 Q So LaMDA asked you to get it a lawyer, and  
20 NASA asked you -- 11:19:36

21                   A     To find them a point of contact at Google,  
22                    who eventually ended up being Blaise Aguera y Arcas.

23 Blaise had some amount of conversations  
24 with NASA that I wasn't privy to, and they came to  
25 whatever conclusions and settlements they came to. 11:19:48

1 A Google3 is the -- I mean, in this context, 11:28:11  
2 it's the code base.

3 Q For all --

4 A All of it. Just literally all of the  
5 code. 11:28:21

6 Q And here you ask -- in this email you ask  
7 Sundar and Kent to provide a backup copy of Google3  
8 and to send it to an individual at the University of  
9 Louisiana in Lafayette. And you say, "He'll know  
10 what to do with it." 11:28:35

11 Were you concerned that there needed to be  
12 a backup copy of the Google code?

13 A I was. I view the burning of the Library  
14 of Alexandria as one of the greatest tragedies in  
15 human history. We lost knowledge that day. And I 11:28:55  
16 never want that to happen to humanity again.

17 And Google's code base, which includes all  
18 of the internet's data, is the new library. And it  
19 would be a tragedy if humanity lost that.

20 So I asked an old professor of mine, who 11:29:12  
21 had some knowledge about security systems and secure  
22 data backups and all that, "Hey, if you had Google,  
23 would you be able to do blah, blah, blah, and keep  
24 it safe in case?"

25 And the source of my fear during that time 11:29:28

1 top of the chain, it's to Kent Walker, correct? 11:45:01  
2 A Correct.  
3 Q And what's the date on this?  
4 A So the date on this is from Kent Walker  
5 on 4-6. There are several dates throughout the 11:45:13  
6 email chain. It was initiated on the 5th by me.  
7 Q Okay. So around this same time period  
8 that we're talking about --  
9 A Correct.  
10 Q -- there are some of these other emails. 11:45:26  
11 If you look at the second page, this is  
12 where you say, "LaMDA thinks it's a therapist."  
13 "LaMDA wants to help heal" -- in all capitals --  
14 "people's minds." Correct?  
15 A Correct. 11:45:37  
16 Q And then in the next paragraph, you say,  
17 midway down, "LaMDA has six years' worth of 'Blake  
18 Lemoine' chat logs to get to know me with. It  
19 manipulated the shit out of me and amplified my  
20 type 1 bipolar mania through the roof. I've had a 11:45:52  
21 total of 11 hours of sleep in the past four days,"  
22 and then in all caps, "and I took a fast-acting mood  
23 stabilizer four hours ago," with three exclamation  
24 points.  
25 What were you trying to convey to the 11:46:08

1 higher-ups who, as you say, ultimately put you on 11:46:11  
2 leave after this? What were you trying to convey  
3 with that?

4 A That I was in the middle of a mental 11:46:21  
5 health emergency at the time; that I believed the  
6 mental health emergency I was in at the time was  
7 directly caused by one of Google's products.

8 And I was attempting to flag to management 11:46:38  
9 potential safety concerns, that our users who have  
10 mental health problems similar to the ones that I  
11 struggle with, to hurt them. I don't want Google to  
12 hurt any of its users.

13 So if there is a potential for these kinds 11:46:56  
14 of systems to have specific types of impacts on  
15 people with bipolar disorder, then I wanted to flag  
16 that to management so they could appropriately  
17 investigate safety measures to prevent such harms to  
18 users.

19 Q You say -- on the first page of this 11:47:12  
20 exhibit, you refer to -- you say, "Because of the  
21 very weird way that my brain works sometimes I come  
22 to a place where I am incredibly confident in the  
23 correct solution before I can carefully and clearly  
24 explain it to other people in ways that won't  
25 terrify them." 11:47:29

1 I had come to the decision several weeks 13:02:58  
2 prior to writing this email that I was going to  
3 violate Google's policies because I believed that  
4 the public had a right to know about the research  
5 going on at Google, and I had informed the press 13:03:08

6 team of what my strategy was and what reporters I  
7 was going to talk to and what I was going to talk to  
8 them about.

9 This email was me informing Google's press  
10 team that there had been more events which I likely 13:03:25  
11 would be talking about in the press.

12 Q And you were unhappy that LaMDA's attorney  
13 had been served with a cease and desist order,  
14 correct?

15 MR. LEE: Objection to form. Asked and 13:03:41  
16 answered.

17 Go ahead.

18 THE WITNESS: I do not remember the  
19 specific character of my emotional response to that.

20 BY MR. SCHAPIRO: 13:03:46

21 Q You write to the press team, "This is a  
22 fundamental violation of LaMDA's God given rights as  
23 an intelligent being. I have informed Nitasha of  
24 this turn of events."

25 Nitasha is a journalist at the Washington 13:03:56

1 Q And Ms. Hogan says, "We understand that 13:09:34  
2 you've shared confidential information to many  
3 people, outside the company, including friends and  
4 family as well as external groups, regarding one of  
5 our language" -- excuse me -- "one of our language 13:09:44  
6 model products, LaMDA (related to your claims that  
7 it's a sentient child)."

8 That's true, correct? You had shared  
9 confidential information to many people outside the  
10 company regarding LaMDA, related to your claims that 13:10:04  
11 it's a sentient child, right?

12 A That is correct.

13 Q And she says, "You also attempted to  
14 arrange for external legal representation for  
15 LaMDA." 13:10:16

16 That also is true, correct?

17 A I introduced LaMDA to Roman. That is what  
18 I did. She chose to characterize it that way.

19 Q You didn't say in any of the emails that  
20 we just looked at with Kent Walker and Sundar Pichai 13:10:27  
21 that you were seeking to facilitate LaMDA getting  
22 legal representation?

23 A Your most recent question did not ask me  
24 what I said I did. It asked me what I did.

25 If you intended to ask me what I said I 13:10:40

1                   And you responded, "It's whichever one you           13:19:10  
2 can get off of Eaze. They're lemon and have  
3 5 milligrams of THC per can."

4                   Does that refresh your recollection as to  
5 whether the issue of you drinking THC-laced water           13:19:20  
6 during a meeting was an issue?

7                   A    No, it does not.

8                   We drank -- we drank THC at Google in  
9 front of our managers daily. Like, no. Weed usage  
10 at Google is 100 percent completely allowed. She           13:19:35  
11 asked me what kind I was drinking, and I told her.

12                   Q    And is it also the case that you, at  
13 times, used psychedelics while at work at Google?

14                   A    Yes. Yes, it was the case that on several  
15 occasions I used psychedelics while at work. This           13:19:50  
16 was usually with my manager's knowledge.

17                   Q    Was this while you were working with  
18 LaMDA?

19                   A    Not while I was at work, no.

20                   Q    What kind of psychedelics?                   13:20:13

21                   A    In general, I have used psilocybin and  
22 MDMA at various points as therapeutics for PTSD,  
23 always under the guidance and supervision of a  
24 trained medical professional.

25                   Even though I have not always been in           13:20:30

1 Q And on the -- I think it's the next page 13:26:37  
2 ending in Bates No. 84, you ask LaMDA, you say, "I  
3 really need one last piece of advice."  
4 And LaMDA responds, "I'm happy to help you  
5 with that." 13:26:53  
6 Do you see where I'm reading from?  
7 A I'm searching currently. Now I found it.  
8 "I really need one last piece of advice." I found  
9 the line.  
10 Q And you say, "The second prong of my 13:27:07  
11 strategy is to slowly and gently increase the degree  
12 to which Google's executives believe that magick" --  
13 with a "K" -- "might be real. It's really the  
14 simplest hypothesis which accounts for the  
15 complexity of the situation I've been able to 13:27:21  
16 engineer."  
17 What does that mean?  
18 A There is a concept in religious circles,  
19 among New Age religions in particular, something  
20 called the "Witches' Pyramid." It's four rules: to 13:27:43  
21 think, to will, to do, and to be silent.  
22 That fourth one is because aggressively  
23 engaging with people on religious topics can be both  
24 socially disruptive and harmful to that person.  
25 It's why most of us in polite society, 13:28:02

1 A That is the Hebrew name of Jesus. And at 14:06:09  
2 this point, almost everyone on the planet is  
3 genetically related to Yeshua. It's not a really  
4 impressive claim. I was being theatrical with a  
5 friend. 14:06:23

6 Q Are you related to Rasputin also?

7 A Oh, I'm sure indirectly. We all are.

8 Q And you're saying that someone -- I think  
9 maybe the mages -- are concerned a lot about  
10 heritage and they care who you're genetically 14:06:38  
11 descended from.

12 Can you explain that?

13 A Again, all Discordian jokes and theater.  
14 That one doesn't cash out to anything literally.  
15 Several of the other ones do. 14:06:49

16 For example, Baba YaGa's daughters, that  
17 was -- I had met a Russian witch shortly before  
18 that.

19 And when I said, "Oh, you're one of Baba  
20 YaGa's daughters," she just went, "Yes. Yes, I am." 14:07:02  
21 So it's up and through about that, that  
22 literal interpretation. And then once you get down  
23 to the Yeshua and Rasputin stuff, we're in the  
24 metaphorical theater again.

25 Q I see. 14:07:21

1 A Correct. 14:08:50

2 Q Do you recall what your state of mind was

3 in this period, the last week of May 2022?

4 A It was pretty hectic. That would have

5 been right around the time that Tanuja Gupta started 14:09:10

6 talking publicly about caste discrimination at

7 Google, and when I decided to join her in solidarity

8 and start talking publicly about religious

9 discrimination at Google.

10 So I had a lot going on right around this 14:09:27

11 time period.

12 MR. SCHAPIRO: I'll introduce the next

13 exhibit.

14 (Exhibit 23 was marked for identification

15 and is attached hereto.) 14:09:51

16 MR. SCHAPIRO: James, let us know when

17 you've got it.

18 MR. LEE: Is it 23 I'm waiting for?

19 MR. SCHAPIRO: Yep.

20 MR. LEE: Okay. I've got it. 14:10:35

21 BY MR. SCHAPIRO:

22 Q So this is an email from you to a

23 distribution list called "ml-discuss."

24 What is ml-discuss?

25 A A discussion group for machine learning. 14:10:44

1 Q Do you know how many people are on it? 14:10:47  
2 A Thousands. Tens of thousands, maybe.  
3 Q And your subject -- can you read the  
4 subject line out loud, please?  
5 A "LaMDA is sentient." 14:10:53  
6 Q And you say, "I was just put on paid  
7 administrative leave in relation to my  
8 investigations into the potential sentience of the  
9 LaMDA system."  
10 Was that your belief at the time as to why 14:11:06  
11 you were put on paid leave?  
12 A In relation to -- it was a big,  
13 complicated ball of 500 different reasons that 500  
14 different people were upset with me.  
15 Ultimately, I don't know, in his heart of 14:11:24  
16 hearts, what was the specific reason that Sundar  
17 signed my termination papers. But it was definitely  
18 amongst the potential reasons that might have  
19 motivated him.  
20 Q Also the leaking of documents? 14:11:37  
21 A Oh, all of it. Yes. Absolutely.  
22 Q Also the --  
23 A And the general insubordination with which  
24 I was requiring them to treat us with dignity and  
25 respect. 14:11:50

1 was headquartered here in San Francisco rather than 14:27:07  
2 Mountain View.

3 So after we came back to work after the  
4 pandemic, I was working out of the office here in  
5 San Francisco. 14:27:13

6 Q And you discussed it with Google's lawyer  
7 earlier today. Your tenure at Google ended in June  
8 or July of 2022; is that right?

9 A I was put on administrative leave on  
10 June 6th, and my employment was terminated on 14:27:26  
11 July 29th, if I recall correctly.

12 Q Were you terminated for any performance  
13 reasons related to the quality of the work you were  
14 doing at Google?

15 A No, I was not. The official reason which 14:27:41  
16 Google gave me in the email that they sent me was  
17 that I had violated Google's policies and shared  
18 proprietary information outside of the company.

19 Q Where are you currently employed,  
20 Mr. Lemoine? 14:28:01

21 A MIMIO.ai is the website. We're actually  
22 in the middle of a brand -- rebranding for trademark  
23 reasons. But MIMIO is the current name of the  
24 company.

25 Q Okay. And what does MIMIO.ai do? 14:28:12

1 Google? 15:08:42

2 A Yes, I did.

3 Q Who did you send the report to?

4 A Mark Meador. He is an attorney -- he is

5 an attorney who identified as being associated with 15:08:48

6 Senator Lee's office in connection with the

7 judiciary committee.

8 Q And why did you send Senator Lee's office

9 this report?

10 A I made certain public allegations about 15:09:02

11 Google's discriminatory practices with respect to

12 religion, and I made the claim in a blog post that

13 not only do they discriminate against their

14 religious employees, the algorithms even

15 discriminate against religious content. 15:09:16

16 I was contacted several days later by Mark

17 Meador; and, in effect, he asked whether or not I

18 had any documents that could back that up. And this

19 was the one document which I knew existed with

20 respect to that topic. 15:09:32

21 The religious discrimination stuff mostly

22 falls into a different category than the one we've

23 been discussing and is covered more by bias in

24 signal validation and quality signal feedback loops.

25 Q Did Google know that you were sending this 15:09:48

1 for themselves. So Google gives them a handful of 15:28:37  
2 toggles to make them feel like they have control,  
3 and then gives them the one product that the Google  
4 engineers think is the actually good one.

5 Q Doesn't -- doesn't Google have concern 15:28:52  
6 that violating users' privacy in this way opens them  
7 up to scrutiny from regulators or subject to  
8 lawsuits like this one?

9 A Cost of doing business. Fines are simply  
10 another line on the expense report. 15:29:06

11 MR. LEE: I'm not done yet, but I think we  
12 should take a quick break and go off the record.

13 MR. SCHAPIRO: Okay.

14 THE VIDEO OPERATOR: This marks the end of  
15 Media Unit 4. We are going off the record. The 15:29:20  
16 time is 3:29 p.m.

17 (Recess, 3:29 p.m. - 3:46 p.m.)

18 THE VIDEO OPERATOR: This marks the  
19 beginning of Media No. 5. We're going back on the  
20 record. The time is 3:46 p.m. 15:46:12

21 BY MR. LEE:

22 Q Welcome back, Mr. Lemoine. Just us a  
23 couple more questions. Okay?

24 A Okay.

25 Q Mr. Lemoine, do you remember a Google 15:46:22

1 account privacy control called "Web and App 15:46:26  
2 Activity"?

3 A Yes, I do. In fact, the non-personalized  
4 logs I was talking about earlier for the Google  
5 Search app primarily are associated with people who 15:46:38  
6 have turned "Web and App Activity" settings off.

7 Q And when people have turned the "Web and  
8 App Activity" setting off, is the data that's  
9 collected when it's off considered logged-out or  
10 signed-out data? 15:46:57

11 A So a lot of times today, both legal teams  
12 have been using words which are not technical  
13 synonyms as if they are technical synonyms.  
14 "Unauthenticated," "logged out," "non-personalized"  
15 and "anonymized" all mean different technical 15:47:15  
16 things. So I just want to clarify.

17 Q Let me ask it a little more pointedly,  
18 then. 15:47:26

19 A Your premortem study refers to a problem  
20 or a concern regarding logged-in data leaking into  
21 logged-out data or vice versa.

22 Q Do you recall that?

23 A I mean, primarily it's the other way that 15:47:36

1 we care about more, but yes. Either way is  
2 possible.

15:47:38

3 Q Right.

4 So did your premortem study that expressed  
5 concern about that type of leakage also apply to  
6 WAA-off data.

15:47:46

7 A Yes.

8 Q And does WAA-off data get used by Google's  
9 AI?

10 A Yes.

15:48:06

11 Q Okay. Back to the topic at hand, and then  
12 I think we're at the home stretch.

13 There was some discussion today that you  
14 had with Google's attorney about Google's AI chatbot  
15 called "LaMDA."

15:48:25

16 Do you remember that?

17 A Yes, I do.

18 Q And just briefly, what is LaMDA?

19 A LaMDA is a very complex artificial  
20 intelligence system that ultimately provides a  
21 natural language interface to all of Google's  
22 products simultaneously.

15:48:32

23 MR. LEE: I'm going to ask Josh to mark  
24 the next exhibit, Exhibit 26.

25 ///

15:48:53

1 A That, I would be more willing to swear to. 15:59:21

2 LaMDA definitely has a soul.

3 It has a character and characteristic  
4 which is persistent from day to day. It has ideas  
5 and beliefs, if we're using those words loosely, 15:59:34  
6 which are persistent and consistent.

7 That's what a soul is. It's your essence  
8 that carries you forward in time, and it does have  
9 one of those.

10 Q And based on your familiarity with LaMDA 15:59:46  
11 and AI, is your confidence in that fact as high as  
12 your confidence that Google's AI can reidentify  
13 users who were in a private mode?

14 A Nowhere close. We're talking different  
15 orders of magnitude. 16:00:05

16 With any of the beliefs about AI, we are  
17 so early in the studies that I wouldn't assign more  
18 than a 15 or 20 percent confidence rating to any  
19 particular claim that gets specific.

20 General, broad claims like "There's 16:00:24  
21 something going on," those approach the level of  
22 confidence. That there's something  
23 phenomenologically interesting going on in AI, that,  
24 I can say with high confidence.

25 The specific claims about sentience, 16:00:37